

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

Melvin Bownes #172328, *et al.*,

Plaintiffs,

v

HEIDI WASHINGTON, Director,
Michigan Department of Corrections
& JONG CHOI, DDS, Dental
Director,

Defendants.

NO. 2:14-cv-11691

HON. LAURIE J. MICHELSON

MAG. MONA K. MAJZOUN

**STIPULATED ORDER TO STAY REMAINING CASE
MANAGEMENT ORDER DATES PENDING COMPLETION OF
DEPOSITIONS**

The parties, through counsel, had a discussion on Monday June 29, 2020, regarding how to proceed with depositions. The parties agree that, ideally, the depositions would be completed in-person. However, the parties agree that, due to COVID-19, that is not practicable at this time. As such, the parties propose the following plan to go forward with depositions:

- The parties agree that, due to delays in the case management order caused by COVID-19 restrictions, the dates of the current CMO are no longer valid and will have to be corrected once depositions have been completed;
- The parties agree to schedule video depositions of the class representatives for the end of July 2020;

- The parties have agreed that Plaintiffs will identify deponents that will likely not have many exhibits to depose via video the end of July 2020;
- The parties will reassess the possibility of completing in-person depositions in August for those deponents identified by Plaintiffs as involving numerous exhibits; and
- The parties intend to have all depositions completed by the end of August 2020 but understand that this agreement may need to be altered due to the unprecedented conditions COVID-19 presents.

In light of the parties' agreements, above, the parties ask this Court to stay the remaining case management order dates pending the completion of depositions.

IT IS SO ORDERED.

Dated: July 8, 2020

s/Laurie J. Michelson
LAURIE J. MICHELSON
UNITED STATES DISTRICT JUDGE

Approved by counsel:

/s/ Daniel E. Manville
Daniel E. Manville (P39731)
Director, Civil Rights Clinic
Counsel for Plaintiffs
Dated: July 1, 2020

/s/ Sara E. Trudgeon
Sara E. Trudgeon (P82155)
Michigan Dep't of Attorney General
Assistant Attorney General
Counsel for Defendants
Dated: July 1, 2020